

Mobil Oil Corporation

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Superfund Branch

February 20, 1987

David Bennett
U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue
Seattle, Washington 98101

HARBOR ISLAND

Dear Mr. Bennett:

This is in response to EPA's information request of July 31, 1986 and our subsequent telephone conversation. In my letter of August 8, 1986, I advised EPA that Mobil's lessees at our Harbor Island facility were Associated Petroleum Products and Camcal. You questioned whether this information was complete because you had observed a sign indicating that Bell Petroleum was also located at the premises. I am advised that Associated Petroleum Products and Bell Petroleum are the same company. I have also been informed that Western Supply and Knappton Maritime are sublessees of Associated. For the terms and conditions of those subleases, you will have to refer to Associated.

The following are our responses to items 2 through 10 of EPA's July 31, 1986 letter. The information regarding historical operations was developed through questioning of long-time employees since records, in most cases, no longer exist. For that reason some of the information may be incomplete but is the best that can be furnished.

Mobil does not generate, store, treat, transport, dispose of or otherwise handle hazardous substances within the definition of Section 101(14) of CERCLA at our Harbor Island facility. Mobil's operations consist of a lubricant oil storage

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Mobil Oil Corporation

David Bennett
February 20, 1987
Page 2

facility. This material falls within the petroleum exclusion of Section 101(14). Up to the 1960's, operations included a gasoline truck loading rack, a garage, a tank farm, and a lube blending plant. These operations were conducted on property contiguous to the present site. That property was sold during the 1960s to Arco, Texaco and Todd Shipyards and Mobil's activities were discontinued. We do not believe any of these operations involved Section 101(14) hazardous substances.

The present facility consists of an office, a warehouse used to store packaged lubricants and a lubricant loading rack. There are six 11,750 gallon storage tanks on-site which are used to store bulk lubes. There is one 11,750 gallon tank used as an oil-water separator. This tank receives water (primarily rainwater) and any oil which may have been spilled at the present lube oil loading rack or dock. Water from the tank is discharged into Elliott Bay under an NPDES permit. The oily residue from the tank is taken by Airo, an oil recycler.

I have been advised that two 1,000 gallon underground storage tanks used to store gasoline for company trucks were removed from the site in 1986 in the presence of the Seattle Fire Department. These were originally installed around 1965. At the time of their removal, these two tanks were tested and found to be tight. When they were removed there was no evidence of soil or water contamination. Two other underground tanks installed around 1965 were formerly used to store number 5 or number 6 fuel oil for an on-site boiler. These were filled with slurry and abandoned in-place about 1982. Personnel recall no leaks from these tanks. As indicated below, there is now only one underground storage tank existing at the site.

Beneath the facility dock is a 500 gallon tank which is used to collect water run-off and any spills or drips of lube oils loaded onto vessels. Its contents are pumped to the 11,750 gallon separator tank. There is one underground tank at the lube loading rack. This, too, is used to collect run-off water, or spilled oil. Its contents are also pumped to the separator tank. Personnel interviewed had no knowledge this tank has ever leaked. From time to time in the past, Mobil personnel have excavated to replace water lines, steam lines, fire lines and other lines. Contamination has not been observed in any of these excavations.

Mobil Oil Corporation

David Bennett
February 20, 1987
Page 3

The dock at the facility was rebuilt around 1981. Various pipes were required to be cut. The work plan was reviewed at a preconstruction meeting by the U.S. Coast Guard and the Department of Ecology and EPA. The project itself was conducted by Rydell Environmental Services. During the course of the project, a boom was placed around the dock which measures approximately 660' x 40'. Controlled spills which occurred when pipes were cut were removed daily by the contractor. The Coast Guard inspected the project weekly.


Spills are known to have occurred from vessels at the dock. Records indicate the following:

5/7/81	1/2 gallon of diesel spilled from Tug "Mars".
5/7/83	30 gallons of diesel spilled from Tug "Geronimo".

While there may have been other vessel spills we do not have records of such. Our records also reflect that on 5/6/81 a truck owned and operated by Butler Construction rolled over on the dock and spilled engine oil and diesel fuel.

At this time, I am unable to provide information regarding insurance. We are continuing to look into this.

Very truly yours,



Stanley Roller

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